

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LINEAGE POWER CORPORATION

vs.

SYNQOR, INC.

Civil Action No. 2:08-cv-95(TJW/CE)

JURY TRIAL DEMANDED

JOINT MOTION TO AMEND DEADLINES

COME NOW Plaintiff Lineage Power Corporation (“Lineage”) and Defendant SynQor, Inc. (“SynQor”) by and through their counsel of record and hereby file and present this their Joint Motion to Amend Deadlines for the Court’s consideration.

The parties jointly agree to and request an extension of certain deadlines in the above-captioned civil action, in order to permit the parties to meet in good faith to determine whether a global or partial resolution of the parties’ respective claims is possible.

I. DEADLINES TO BE AMENDED REGARDING TRANSFERRED PATENTS

The parties request that the following deadlines set by the Court’s March 27, 2009 Order (Dkt. 54) be extended with regard to U.S. Patent No. 6,138,344, U.S. Patent No. 6,005,773, U.S. Patent No. 5,036,452, and U.S. Patent No. 6,310,301 (collectively referred to as the “transferred patents”):

Event	Current Deadline	Proposed Extended Deadline
Deadline to comply with P.R. 3-3 and 3-4	May 29, 2009 (per Dkt. 54)	September 4, 2009
Comply with Paragraphs 3(b), 3(c) and 3(d) of Court's Discovery Order (Dkt. 31) regarding Additional Disclosures	June 26, 2009 (per Dkt. 54)	September 25, 2009
Parties shall exchange privilege logs	August 21, 2009 (per Dkt. 54)	November 30, 2009
Parties shall inform the Court regarding disputes concerning claims of privileged documents	October 30, 2009 (per Dkt. 54)	January 29, 2010

II. DEADLINES TO BE AMENDED REGARDING ORIGINAL PATENTS

The parties request that the following deadlines be extended regarding Lineage's U.S. Patent No. Re. 36,571 and U.S. Patent No. 6,191,964 and SynQor's U.S. Patent No. 6,594,159, U.S. Patent No. 6,731,520, and U.S. Patent No. 7,119,524 (collectively referred to as the "original patents"):

Event	Current Deadline	Proposed Extended Deadline
Comply with Paragraph 3(c) of Court's Discovery Order (Dkt. 31) regarding Additional Disclosures	June 26, 2009 (per Dkt. 54)	September 25, 2009
Parties shall exchange privilege logs	May 29, 2009 (per Dkt. 31)	November 30, 2009
Parties shall inform the Court regarding disputes concerning claims of privileged documents	August 7, 2009 (per Dkt. 31)	January 29, 2010

III. CONCLUSION

The parties will meet in good faith within the next sixty (60) days to discuss whether the parties can reach a global or, if not global, a partial resolution of the pending claims between the parties.

The parties do not seek the requested extensions for purposes of delay, but so that justice may be done.

The parties respectfully request that the Court grant the relief requested in this Motion.

DATED: May 6, 2009

Respectfully submitted,

/s/ Diane V. DeVasto

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(with permission by Diane V. DeVasto)

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CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 6th day of May 2009.

/s/ Diane V. DeVasto

Diane V. DeVasto